

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
MIDDLE DIVISION**

**LARRY T. LACY,**

**Plaintiff,**

**vs.**

**THE CITY OF WADLEY,**

**Defendant.**

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**CASE NO.: 3:08CV56-MHT**

**DEFENDANT'S RULE 26(a)(1) INITIAL DISCLOSURES**

Comes now the Defendant, the City of Wadley ("Defendant"), who, pursuant to Rule 26(a)(1), and the Report of Parties Planning Meeting disclose the following information:

**A. Persons that Might Have Discoverable Information.**

- (1) Catherine Stringfellow- Current Wadley Council Member, P O Box 9, Wadley, Alabama 36276.
- (2) Michael James- Current Wadley Council Member, P O Box 9, Wadley, Alabama 36276.
- (3) Toni Gay- Current Wadley Council Member, P O Box 9, Wadley, Alabama 36276.
- (4) Kathryn Moore - Current Wadley Council Member, P O Box 9, Wadley, Alabama 36276.
- (5) Charlie Smith- Current Wadley Council Member, P O Box 9, Wadley, Alabama 36276.
- (6) Lori Hamby- Current Wadley Employee, P O Box 9, Wadley, Alabama 36276.
- (7) Marsha Poe- Current Wadley Employee/City Clerk, P O Box 9, Wadley, Alabama 36276.
- (8) Larry Wilkes- Current Wadley Employee, P O Box 9, Wadley, Alabama 36276.
- (9) Chad Hopkins- Current Wadley Employee, P O Box 9, Wadley, Alabama 36276.
- (10) Kenny Battle- Current Wadley Employee, P O Box 9, Wadley, Alabama 36276.
- (11) Carolyn Atkisson- Current Wadley Employee, P O Box 9, Wadley, Alabama 36276.

- (12) Jimmy Holmes- Current Wadley Employee, P O Box 9, Wadley, Alabama 36276.
- (13) Shannon Laney- Current Wadley Employee, P O Box 9, Wadley, Alabama 36276.
- (14) Timothy Terry- Current Wadley Employee, P O Box 9, Wadley, Alabama 36276.
- (15) George Shears- Current Wadley Employee, P O Box 9, Wadley, Alabama 36276.
- (16) Bobby McBrayer - Current Wadley Employee, P O Box 9, Wadley, Alabama 36276.
- (17) Bruce W. Albright - Mayor of Wadley, P O Box 9, Wadley, Alabama 36276.
- (18) Jim Cleveland - Former Council Member of City of Wadley
- (19) Elliott Cotney - Former Council Member of City of Wadley
- (20) Doris Marbury - Former Council Member of City of Wadley
- (21) Frank Reaves - Former Council Member of City of Wadley

**B. Documents, Data Compilations, and Tangible Things in Defendants' Control.**

The Defendant will make available for copying the following documents: (1) Copy of Plaintiff's Time Sheets for the Relevant Period(s), (2) Personnel File of Plaintiff, (3) Copy of Plaintiff's Pay Stubs for the Relevant Period(s) (4) Wadley Town Council Minutes relevant to Plaintiff's hiring and/or departure from City, (5) State of Alabama, Department of Industrial Relations, Unemployment Compensation Documents re: Plaintiff (6) any and all photographs expected to be used at trial, if any.

**C. Damages Information.**

Not applicable to Defendants.

**D. Insurance Coverage Information.**

The City of Wadley, Alabama is insured by and through a policy of insurance issued by Alabama Municipal Insurance Corporation. A copy of the declarations page from the specific

relevant policy will be made available for copying.

Respectfully submitted,

/s/ C. David Stubbs  
**C. David Stubbs** (ASB-7248-U83C)  
Attorney for Defendant,  
The City of Wadley

**OF COUNSEL:**

STUBBS, SILLS & FRYE, P.C.  
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Email: [david-ssf@cableone.net](mailto:david-ssf@cableone.net)

**CERTIFICATE OF SERVICE**

I hereby certify that on this the 27<sup>th</sup> day of August, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to: Robin F. Reynolds, Esq. and Angela J. Hill, Esq.

/s/ C. David Stubbs  
**OF COUNSEL**